



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 12, 2014

William W. Stelle, Jr.
Regional Administrator
National Marine Fisheries Service, West Coast Region
National Oceanic and Atmospheric Administration
7600 Sand Point Way NE, Building 1
Seattle, WA 98115-0070

Re: EPA Region 10 Comments on the Final Environmental Impact Statement (FEIS) to Inform Columbia River Basin Hatchery Operations and the Funding of Mitchell Act Hatchery Programs (EPA Project Number 04-049-NOA)

Dear Mr. Stelle:

The EPA has reviewed the final EIS for the above referenced project. Our comments are provided in accordance with our responsibilities and authorities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

The overarching purpose of this FEIS is to inform the selection of a National Marine Fisheries Service (NMFS) policy direction that will guide the distribution of Mitchell Act hatchery funds and inform NMFS' future review of Columbia River basin hatchery programs under the Endangered Species Act (ESA). The FEIS provides a refined analysis of the no action alternative and the four action alternatives presented in the Draft EIS. The FEIS also analyzes a sixth alternative, which is identified as the Preferred Alternative. Alternative 6 represents a compilation of management concepts explored in the Draft EIS.

In our December, 2010 comments on the Draft EIS, the EPA indicated support for the overarching direction being pursued but raised a number of questions and concerns. Many of these concerns related to the completeness of the DEIS with regard to the range of alternatives and implementation scenarios analyzed. Specifically, we encouraged NMFS to consider an alternative that would apply the Draft EIS's "stronger performance goal" to the entire project area (rather than only the upper basin or lower basin). This is a key feature of the new Alternative 6. We are very pleased with the development of Alternative 6, and its identification as the Preferred Alternative. We believe these stronger performance goals will minimize the risks of hatchery programs on natural-origin salmon and steelhead populations throughout the basin.

We also commented on the economic analysis in the DEIS and questioned some apparent inconsistencies with other data sources regarding income generated through Columbia Basin fisheries. We appreciate the care taken by NMFS in responding to this comment in the FEIS. We have reassessed our comment on the economic analysis and concur with the conclusion reached by NMFS in Appendix L. We find the estimates of household personal income generated from Columbia Basin fisheries used by NMFS (Section 3.3) to be consistent with previous analyses conducted by the Independent Economic Analysis Board (IEAB) and appropriate for the economic analysis in the FEIS.

We also appreciate the response to our comments on the monitoring, evaluation and reform (MER) program; tribal consultation; and the basis for the hatchery management principles put forward in the document. Based on the responses provided in the Global Responses in Appendix L and the refined analysis in the FEIS we are satisfied that our comments have been addressed.

We have also reviewed Section 3.6 of the FEIS (Water Quality and Quantity). Our review of this section finds that our comments and suggested corrections have been fully incorporated. Finally, we also appreciate the effort taken by NMFS to improve the overall readability of the document. We believe the modifications to Chapters 2 and 4 enhance the accessibility of this document to a broad range of reviewers.

We appreciate the opportunity to provide comments on this final EIS. Please contact me with any questions at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit